



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 4/7/2003
Time Start 1:35 PM
Time Finish 2:40 PM

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATORCompany name C.M.S. GILBRETH PACKAGING I.D. Number PAD 981103617Site Address 3001 STATE ROAD CROYDONCounty BUCKS Municipality BRISTOL TWP. Zip 19021Name of Inspector ALEX PAGEName & Title of Responsible Official JOEL SPADE - ENGR. + MAINTENANCE MGR.Person Interviewed JOEL SPADE Telephone (215) 826-2473Mailing Address (if different from above) -Amount of Hazardous Waste Generated per Month: 8000 Pounds - Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other -PBR: ☐ Neutralization/WWTP ☐ Reclaim Other -GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity HandlerUniversal Waste Types -

3. Hazardous Waste Transporters:

Transporter Name HMMTTC RESPONSE, INC. License Number PA AH0554Transporter Name - License Number -Transporter Name - License Number -

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>D001</u>	<u>WASTE PRINTING INK</u>	<u>HUKILL CHEMICAL CO.</u>
<u>F003</u>	<u>WASTE FLAMMABLE LIQUIDS</u>	<u>7013 KRICK RD.</u>
		<u>BEDFORD OHIO 44146</u>

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CMS GILBRETH ID Number PAD 981103617 Date 4/7/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CMS GILBERTH ID Number PAD 981103617 Date 4/7/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name C.M.S. GILBERTH ID Number PAD 981103617 Date 4/7/2003

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
				LQG TANKS (Subchapter J)			
	X			Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
	↓			Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
				Special small quantity generator requirements	265a.1	265.201	H048
	X			SQG TANKS			
	↓			Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CMS GILBRETH ID Number PAD 981103617 Date 4/7/03

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Containment Buildings (Subchapter T)			
	↓			Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
				Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
	X			Drip Pads (Subchapter S)			
	↓			Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
				Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 4/7/2003 Identification Number PAD 981103617Company/Facility/Site Name CMS GILBRETH

INSPECTION CONDUCTED BY ALEX PAGE. JOEL SPADE, ENGR. + MAINTENANCE MANAGER, WAS THE FACILITY GUIDE. CMS GILBRETH IS A MANUFACTURER OF PRINTED LABELS USING THE FLEXOGRAPHIC OR ROTOGRAVURE PRINTING PROCESS. CMS GILBRETH EMPLOYS ABOUT 100 PEOPLE WHO WORK 2 SHIFTS. SECURITY IS PROVIDED BY AN ALARM SYSTEM AND FENCED-IN YARD WITH GATED ACCESS.

HAZARDOUS WASTES ARE WASTE PRINTING INKS AND WASTE FLAMMABLE SOLVENTS.

THE HAZARDOUS WASTE STORAGE AREA IS A FREE-STANDING METAL BUILDING WITH A GRATED FLOOR, FIRE SUPPRESSION SYSTEM, AND SECURED ACCESS. DRUMS OF HAZARDOUS WASTE APPEARED PROPERLY LABELLED.

AT A RECORD REVIEW, MANIFESTS WERE AVAILABLE AND APPEARED PROPERLY COMPLETED AND ROUTED WITHIN

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

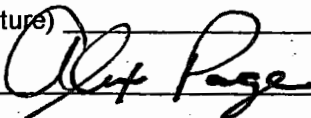
This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) _____



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 4/7/2003 Identification Number PAD 981103617Company/Facility/Site Name CMS GILBRETHTIME LIMITS.THE P.P.C. PLAN CONTAINED ALL THE REQUIRED
ELEMENTS AND APPEARED UP TO DATE.TRAINING RECORDS WERE AVAILABLE FOR THOSE
EMPLOYEES WHO HANDLE HAZARDOUS MATERIALS AND
DEAL WITH EMERGENCY RESPONSE. BETTER
DOCUMENTATION OF TRAINING IN HAZARDOUS WASTE
MANAGEMENT PROCEDURES IS SUGGESTED.IN GENERAL, A CONTINUOUS IMPROVEMENT IN
HOUSEKEEPING AND MAINTENANCE WAS OBSERVED
AT CMS GILBRETH.NO VIOLATIONS OBSERVED

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

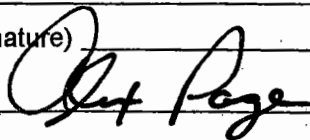
This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____

Date _____

Inspector (signature) _____





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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 2/12/2002
Time Start 1:00 PM
Time Finish 3:30 PM

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name C.M.S. GILBRETH PACKAGING I.D. Number PAD 981103617
Site Address 3001 STATE ROAD CROYDON
County BUCKS Municipality BRISTOL TWP. Zip 19021
Name of Inspector ALEX PAGE
Name & Title of Responsible Official JOEL SPADE - ENGINEERING + MAINT. MGR.
Person Interviewed JOEL SPADE Telephone (215) 826-2473
Mailing Address (if different from above) SAME
Amount of Hazardous Waste Generated per Month: 8000 Pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____

PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name HMTTC RESPONSE, INC. License Number PA-AH0554

Transporter Name _____ License Number _____

Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001	WASTE PRINTING INK	HUKILL CHEMICAL CO.
F003	WASTE FLAMMABLE LIQ.	7013 KRICK RD.
		BEDFORD OHIO 44146

COMMONWEALTH OF PENNSYLVANIA
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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CHS GILBERTH ID Number PA0981103617 Date 2/12/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
X				Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
X				Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
X				Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
X				Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
X				PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
X				Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CMS GILBRETH ID Number PAD 981103617 Date 2/12/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
X				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
X				Containers and stored waste compatible	265a.1	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
X				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
X				Container storage areas inspected at least weekly	265a.1	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
X				Proper containment and collection systems in place	265a.179		H033
X				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
X				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
X				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
X				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CMS GILBRETH ID Number PAD 981103617 Date 2/12/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			LQG TANKS (Subchapter J)			
				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	V			Special small quantity generator requirements	265a.1	265.201	H048
	X			SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
				Incompatible waste requirements met	265a.1	265.201(f)	H059
	V						

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CMS GILBERT ID Number PAP981103617 Date 2/12/2002

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	✓			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
	X			Drip Pads (Subchapter S)			
				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
	✓			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 2/12/2002 Identification Number PAD 981103617Company/Facility/Site Name CMS GILBRETH PACKAGING SYSTEMS

INSPECTION CONDUCTED BY ALEX PAGE. JOEL
SPADE, ENGINEERING AND MAINTENANCE MANAGER,
WAS THE FACILITY GUIDE. CMS GILBRETH PACKAGING
SYSTEMS IS A MANUFACTURER OF PRINTED LABELS
USING THE FLEXOGRAPHIC OR ROTOGRAVURE
PRINTING PROCESS. CMS GILBRETH EMPLOYS 102
PEOPLE WHO WORK 2 SHIFTS. 24 HOUR SECURITY
IS PROVIDED BY AN ALARM SYSTEM AND GATED
ACCESS.

CMS GILBRETH GENERATES THE FOLLOWING
HAZARDOUS WASTES: (1) WASTE SOLVENT BASED
PRINTING INKS (2) WASTE FLAMMABLE SOLVENTS.
ELECTROPLATING SLUDGE SOLID HAZARDOUS WASTE IS
NO LONGER GENERATED.

AT THE HAZARDOUS WASTE STORAGE AREA, DRUMS
OF HAZARDOUS WASTE ARE STORED IN A FREE
STANDING METAL BUILDING WITH A GRATED FLOOR

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Joel E. SpadeDate 02/20/2002Inspector (signature) Alex Page

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BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 2/12/2002 Identification Number PAD 981703617

Company/Facility/Site Name CMS GILBRETH PACKAGING SYSTEMS
FOR CONTAINMENT. THE BUILDING WAS LABELLED,
HAD SECURED ACCESS, AND HAD A BUILT-IN
AUTOMATIC FIRE SUPPRESSION SYSTEM. DRUMS OF
HAZARDOUS WASTE WERE NEATLY STORED WITH
aisle access for inspection. DRUMS WERE
LABELLED TO ACCURATELY IDENTIFY THE CONTENTS
AND ACCUMULATION START DATES WERE LESS
THAN 90 DAYS.

AT A RECORD REVIEW, MANIFESTS WERE
AVAILABLE AND APPEARED PROPERLY COMPLETED,
ROUTED WITHIN TIME LIMITS, AND HAD LAND
DISPOSAL RESTRICTIONS ATTACHED. A COPY OF
AT TYPICAL MANIFEST IS INCLUDED WITH THIS
REPORT.

THE PREPAREDNESS, PREVENTION AND CONTINGENCY
PLAN CONTAINED ALL THE REQUIRED ELEMENTS AND
APPEARED UP-TO-DATE. EMERGENCY COORDINATOR'S

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Person interviewed (signature)

Joel E. SpadeDate 02/20/2002

Inspector (signature)

Out Page

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 2/12/2002 Identification Number PAD 981103617Company/Facility/Site Name CMS PACKAGING SYSTEMSNAMES, ADDRESSES, AND PHONE NUMBERS WERE CHECKED
AND FOUND TO BE CORRECT.TRAINING RECORDS INCLUDING COURSE DESCRIPTIONS
AND SIGN-IN SHEETS WERE AVAILABLE FOR THOSE
EMPLOYEES WHO MANAGE HAZARDOUS WASTE.IN GENERAL, THIS FACILITY APPEARED CLEANER,
BETTER ORGANIZED, AND BETTER MANAGED THAN
IN PREVIOUS INSPECTIONS.NO VIOLATIONS OBSERVED

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Person interviewed (signature)

Joel E. Spade

Date

02/20/2002

Inspector (signature)

Chris Page

Information within the bold red border is not required by Federal law but may be required by State law.

10116105

Inspection ID		Trap Type		Compliance Evaluation		Date Inspected	
030443		ICE				03/25/02	
Inspected Entry							
City	State	County	City	State	County	City	State
PA	PA	PA	PA	PA	PA	PA	PA
Type		Capture Method		Status		Active	
CAPTIVE		Bait		Status		Active	
More Info		Sub		Fac		Type	
0001		PA00110017		ONS GLBRETH PACKAGING SYS		Type	
SF Status							
<div> <div>General</div> <div>Trap SF</div> <div>Viol</div> <div>Comp Asst</div> <div>Cover Area</div> <div>Admin</div> </div>							
Owner/Operator		03-100443		ONS GLBRETH PKG SYS			
Complaint		Inspector		PAGE, ALEX		MENU	
Due Date		Inspection Result		NOVI		No Violations Noted	
Date Scheduled		Scheduled By					
Agency		PA Dept of Environmental Protection		Charter/Dept Insp		Violated	
Program		IC Code		SE REGIONAL OFFICE, CONSHOHIO		External Details	
SF Number		County		District		Municipality	
0001		PA		0001		District	
<div> <div>030443</div> <div>03/25/02</div> <div>Go To</div> </div>							

Sub Facility Status

Success

Page 1 of 1

Time Finish 1:30 PM

Page 1 of 16

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name CMS GILBRETH ID Number PA0981103617 Date 02/24/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED. CIT. 40 CFR	LINE NO.
			X	Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
X				Identification Number	262a.10	262.12	H002
X				Authorized transporters only	262a.10	262.12(c)	H003
X				Subsequent notification requirements met	262a.12(b)		H004
X				Proper manifest used	262a.10	262.21	H005
X				Manifests filled out correctly and completely	262a.20		H006
X				Manifests signed and routed properly	262a.23(a)	262.23	H007
			X	Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	X			SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
X				Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
			X	Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
X				Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
X				Specified records retained for three years	262a.10	262.40(c)	H014
X				Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
			X	Exception reporting procedures followed	262a.42	262.42	H016
X				Spill reporting procedures followed	262a.10	262.34(d)	H017
			X	PPC plan developed and implemented	262a.10	262.34(a)	H018
X				Special requirements followed for international shipments	262a.10	262.50 262.60	H019
			X	Source reduction strategy prepared and available (LQG only)	262a.100		H020
X				Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CMS GILBRETH ID Number PA0 981103617 Date 2/24/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA Code	FED CIT. 40 CFR	LINE NO.
				CONTAINERS (Subchapter I)			
			X	Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
X				Containers of hazardous waste in good condition	265a.1	265.171	H026
		X		Containers and stored waste compatible	265a.1	265.172	H027
		X		Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
X				Containers managed to prevent leaks	265a.1	265.173(b)	H029
		X		Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
		X		Container storage areas inspected at least weekly	265a.1	265.174	H031
		X		Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
		X		Proper containment and collection systems in place	265a.179		H033
		X		Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
		X		Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
		X		Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
		X		Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CMS GILBRETH ID Number PA0981103617 Date 2/24/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			LQG TANKS (Subchapter J)			
				Tanks labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H040
				Written certification by registered professional engineer for proper tank (system) design and installation on file	262a.10	265.192(a)	H041
				Secondary containment provided for tanks (systems) as required	265a.193	265.193	H042
				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265a.1	265.194	H043
				Tanks labeled to accurately identify contents	265a.194		H044
				Required inspections completed and documented in operating log	265a.195	265.195	H045
				Release reported to Department within 24 hours, unless exempted	265a.1	265.196	H046
				Special requirements for ignitable and reactive wastes followed	265a.1	265.198	H047
	V			Special small quantity generator requirements	265a.1	265.201	H048
	X			SQG TANKS			
				Waste contents compatible with tank	265a.1	265.201(b)(2)	H051
				Uncovered tanks operated with 2 feet of freeboard or equivalent containment capacity	265a.1	265.201(b)(3)	H052
				If continuously fed, tank has method to stop inflow	265a.1	265.201(b)(4)	H053
				Daily tank inspection requirements complied with	265a.1	265.201(c)(1-3)	H054
				Weekly tank inspection requirements complied with	265a.1	265.201(c)(4,5)	H055
				All waste removed at closure	265a.1	265.201(d)	H056
				Special requirements for ignitable or reactive waste complied with	265a.1	265.201(e)(1)	H057
				Covered tank buffer zone requirements complied with	265a.1	265.201(e)(2)	H058
	V			Incompatible waste requirements met	265a.1	265.201(f)	H059

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS FACILITY SPECIFICS

Site Name CMS GILBRETH ID Number PAD 981103617 Date 2/24/2000

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	PA CIT. 25 PA CODE	FED CIT. 40 CFR	LINE NO.
	X			Containment Buildings (Subchapter T)			
				Building completely enclosed to prevent exposure to the elements	265a.1	265.1101(a)(1)	H061
				Meets special requirements if liquids present	265a.1	265.1101(b)	H062
				Primary barrier free of significant gaps, cracks and deterioration	265a.1	265.1101(c)(1)(i)	H063
				Level of hazardous waste within unit is below containment walls	265a.1	265.1101(c)(1)(ii)	H064
				Tracking of waste out of unit by equipment or personnel prevented	265a.1	265.1101(c)(1)(iii)	H065
				No visible dust emissions at doors, windows, vents, etc.	265a.1	265.1101(c)(1)(iv)	H066
				Professional engineer's certification placed in operating record	265a.1	265.1101(c)(2)	H067
	Y			Required inspections performed and logged in operating record	265a.1	265.1101(c)(4)	H068
	X			Drip Pads (Subchapter S)			
				Engineer's certification of existing drip pads on file	265a.1	265.441(a)	H069
				Drip pad meets 265.443 design & operating standards	265a.1	265.443	H070
				(a) nonearthen, sloped construction with berm to channel associated drippage to collection system	265a.1	265.443(a)	H071
				(b) Has synthetic liner below the pad with properly constructed leak detection system	265a.1	265.443(b)	H072
				Drip pads & collection system maintained to prevent deterioration	265a.1	265.443(c)	H073
				Drip pads & collection systems designed to prevent run-off	265a.1	265.443(d)	H074
				Run-on/run-off control system maintained unless pad protected by a structure	265a.1	265.443(e)	H075
				Release reporting requirements met	265a.1	265.443(m)	H076
	Y			Drip pads inspected weekly and after storms when in operation	265a.1	265.444(b)	H077

INSPECTION REPORT COMMENTS

COMPANY / SITE NAME **CMS Gilbreth Packaging Systems**

IDENTIFICATION NUMBER **PAD981103617**

DATE OF INSPECTION **02/24/2000**

Inspection conducted by Alex Page. Patricia Unrath, of PH Engineering, Inc. and David Case of Turn-Key Environmental Services, Inc. were the facility guides. CMS Gilbreth Packaging Systems, Inc. manufacture heat shrinkable labeling for commercial and industrial use. The plant employs approximately 150 people who work 3 shifts. Hazardous wastes generated include spent xylenes, ethyl acetate, propanol, and electroplating sludge waste. About 100,000 lbs. of hazardous waste are generated each year.

On Feb. 16, 2000, a fire in the hazardous material/hazardous waste storage room resulted in an employee being seriously burned. A new employee who had not yet received training in hazardous waste management procedures mixed strong acid and solvent waste in a metal 55 gallon drum. The employee who mixed the hazardous waste noticed a fire in the drum and left the room to get help. Another employee with more tenure at the facility used his shirt to smother the flames. The fire in the drum flared and the second employee was burned on the face, arm and hands. These burns required hospitalization.

At the hazardous waste storage area, both unlabeled and incompletely labeled 55 gallon drums were observed. Containers of old ink had no determination as to hazardous constituents. Drums were placed haphazardly and there was no aisle spacing for inspection. Some drums had no accumulation start date and some drums had accumulation start dates that were over the 90 day limit. The containment area had a deteriorated blacktop surface. Any drum leakage would seep into the soil. A weekly log to indicate the condition of the drums in the storage area was not available.

During a walking tour of the facility, some drums of hazardous waste were observed to be open with open funnels placed in the bung holes. Containers of rags used to wipe hazardous waste off of operating equipment did not have hazardous waste labels.

At a review of the company records, manifests were available and appeared properly completed and routed. Some manifests did not have the Copy 5 - TSD to Generator copy. Some exception reporting appeared not to have been completed. No source reduction strategy was available. The preparedness, prevention, and

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Person Interviewed (Signature) _____

Date _____

Inspector Signature) _____

Date

2/24/2000

File name: CMSGil.doc

Page **6** of **16**

INSPECTION REPORT COMMENTS

COMPANY / SITE NAME **CMS Gilbreth Packaging Systems**

IDENTIFICATION NUMBER **PAD981103617**

DATE OF INSPECTION **02/24/2000**

contingency plan was not complete—addresses for emergency coordinators and procedures to be undertaken in an emergency were not included.

Copies of two manifests showing typical hazardous wastes generated are included with this report.

Sixteen violations of the hazardous waste regulations of the Solid Waste Management Act and/or Title 40 Code of Federal Regulations and one violation of the Clean Streams Law were observed.

1. CMS Gilbreth failed to perform a hazardous waste determination on waste ink. This is in violation of Title 25 Pa. Code Section 262.11, and Title 40 Code of Federal Regulations Section 262.11.
2. CMS Gilbreth stored hazardous waste for a period longer than 90 days. This is in violation of Title 25 Pa. Code Section 262.34 and Title 40 Code of Federal Regulations Section 262.34.
3. CMS Gilbreth failed to train their personnel in hazardous waste management procedures. This is in violation of Title 25 Pa. Code Section 265.16 and Title 40 Code of Federal Regulations Section 265.16.
4. CMS Gilbreth failed to contact the hazardous waste disposal facility and resolve missing manifests—(failed to conduct proper exception reporting). This is in violation of Title 25 Pa. Code Section 262.42 and Title 40 Code of Federal Regulations Section 262.42.
5. CMS Gilbreth failed to fully develop and implement a preparedness, prevention, and contingency plan (PPC plan). Emergency measures and emergency coordinators addresses were missing from the

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Person Interviewed (Signature) _____ Date _____

Inspector Signature) Ally Page _____ Date 2/24/2000

File name: CMSGil.doc

Page 7 of 16

INSPECTION REPORT COMMENTS

COMPANY / SITE NAME **CMS Gilbreth Packaging Systems**

IDENTIFICATION NUMBER **PAD981103617**

DATE OF INSPECTION **02/24/2000**

plan. This is in violation of Title 25 Pa Code Section 264.52 and Title 40 Code of Federal Regulations Section 264.52.

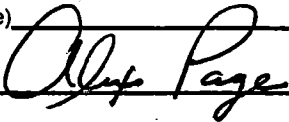
6. CMS Gilbreth failed to develop a source reduction strategy. This is in violation of Title 25 Pa. Code Section 262.100.
7. CMS Gilbreth failed to store hazardous waste in containers that were compatible with that waste. Hazardous waste acids were stored in metal containers. This is in violation of Title 25 Pa. Code Section 265.172 and Title 40 Code of Federal Regulations Section 265.172.
8. CMS Gilbreth failed to keep containers of hazardous waste closed except during the addition or removal of hazardous waste. This is in violation of Title 25 Pa. Code Section 265.173 and Title 40 Code of Federal Regulations Section 265.173.
9. CMS Gilbreth failed to configure containers to insure safe management and access for inspection purposes. Containers were haphazardly placed in and around the hazardous waste storage area. This is in violation of Title 25 Pa. Code Section 265.178(e)(3).
10. CMS Gilbreth failed to inspect hazardous waste storage areas at least weekly and keep a log of these inspections. This is in violation of Title 25 Pa. Code Section 265.174 and Title 40 Code of Federal Regulations Section 265.174.
11. CMS Gilbreth failed to implement special requirements for incompatible wastes. Incompatible acid and solvent waste were mixed resulting in spontaneous ignition of the combined waste. This is in

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Person Interviewed (Signature)  Date
Inspector Signature Date 2/24/2000
File name: CMSGil.doc Page 18 of 16

INSPECTION REPORT COMMENTS

COMPANY / SITE NAME **CMS Gilbreth Packaging Systems**

IDENTIFICATION NUMBER **PAD981103617**

DATE OF INSPECTION **02/24/2000**

violation of Title 25 Pa. Code Section 265.17(a) and Title 40 Code of Federal Regulations Section 265.17(a).

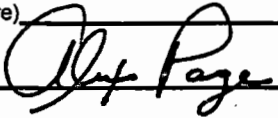
12. CMS Gilbreth failed to store hazardous waste in a containment area with an impervious base free from cracks. This is in violation of Title 25 Pa. Code Section 265.179.
13. CMS Gilbreth failed to manage hazardous waste placed in a container in accordance with the requirements of subpart AA. Containers of hazardous waste were open allowing vapors to escape into the atmosphere. This is in violation of Title 40 Code of Federal Regulations Section 265.178.
14. CMS Gilbreth failed to mark containers of hazardous waste with accumulation start dates. This is in violation of Title 25 Pa. Code Section 262.34(a)(2) and Title 40 Code of Federal Regulations Section 262.34(a)(2).
15. CMS Gilbreth failed to mark hazardous waste containers with the words "HAZARDOUS WASTE". This is in violation of Title 25 Pa. Code Section 262.34(a)(3) and Title 40 Code of Federal Regulations Section 262.34(a)(3).
16. CMS Gilbreth failed to accurately label containers of hazardous waste to identify their contents. This is in violation of the Solid Waste Management Act Section 6018.403(b).
17. CMS Gilbreth allowed for the potential pollution of the waters of the Commonwealth. Hazardous waste drums were stored in deteriorated containment near Hog Run Creek posing a potential threat to the waters of the Commonwealth. This is in violation of Section 402 of the Clean Streams Law.

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Person Interviewed (Signature) _____ Date _____
Inspector Signature)  _____ Date 2/24/2000
File name: CMSGil.doc Page 9 of 16

Information within the blue border is not required by Federal law but may be required by State law.

A. State Manifest Document Number
PAE 5288894

B. State Gen. ID
Same

C. State Trans. ID
PA-AH 0339

D. Transporter's Phone (800) 476-9699

PA-AH

F. Transporter's Phone ()

G. State Facility's ID

H. Facility's Phone (513) 541-1823

12. Containers		13. Total Quantity	14. Unit Wt/Vol	1. Waste No.
No.	Type			
02	DM	800	P	F006

a. RG Hazardous Waste Solid, NOS
9, NA3077, P6 II (F006)

K. Handling Codes for Wastes Listed Above

Min.

b

a. Approval No. X19522; ER 6 No. 171
UPW 035921-OH.

24 Hour Emergency Phone Contact
Chemtrec @ 800-424-9300

#1-TAS794 44-61974-75

Certificate of Disposal Required

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

MONTH DAY YEAR

Dr Zobel

2011

11 7749

Printed/Typed Name _____

Signature

MONTH DAY YEAR

Printed/Typed Name

Signature

MONTH DAY YEAR

19. Discrepancy Indication Space

20. Facility owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name _____

Signature

MONTH. DAY YEAR

203-01
Kian Morgan

Chas. W. L. L.

6210499

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest
Document No.2. Page 1
of 1Information within the blue border is not
required by Federal law but may be
required by State law.

3. Generator's Name and Mailing Address

CMS Gilbreth Packaging Systems
3001 State Rd.
Croydon, PA 19021

A. State Manifest Document Number

PAE 5288942

B. State Gen. ID

Same

5. Transporter 1 Company Name

Allstate PowerVal

6. US EPA ID Number

NJID003812047

C. State Trans. ID

PA-AH 0339

7. Transporter 2 Company Name

8. US EPA ID Number

D. Transporter's Phone (800) 876-1666

E. State Trans. ID

PA-AH

F. Transporter's Phone ()

G. State Facility's ID

H. Facility's Phone (212) 961-8618

9. Designated Facility Name and Site Address

North East Chemical
3301 Monroe Ave.

10. US EPA ID Number

Cleveland Ohio 44113 10.HID980681571

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

No.

Type

13. Total
Quantity14. Unit
Wt/Vol

1. Waste No.

a. Waste Flammable Liquids, NOS
3, UN1993, PG II
Xylene Ethyl Acetate

15

DM

750

G

001, 2035

b. Waste Flammable Liquids, NOS
3, UN1993, PG II (Propanol)

16

DM

600

G

D001

J. Additional Descriptions for Materials Listed Above

Lab Pack

Physical State

Lab Pack

Physical State

a.

b.

c.

d.

e.

f.

g.

h.

K. Handling Codes for Wastes Listed Above

a.

c.

b.

d.

15. Special Handling Instructions and Additional Information

a. Approval No. 38479 ; ERL No. 128

b. Approval No. 38480 ; ERL No. 128

24 Hour Emergency Phone Call
Chemtree @ 800-424-9300

Certificate of Disposal Required

16. GENERATOR'S CERTIFICATION:

I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are
classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically
practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and
the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available
to me and that I can afford.

Printed/Typed Name

D.C. LOBEL

Signature

[Signature]

MONTH DAY YEAR

12 29 99

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

J. SUSTINEO

Signature

[Signature]

MONTH DAY YEAR

12 29 99

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

CARL VERA

Signature

[Signature]

MONTH DAY YEAR

01 10 00

19. Discrepancy Indication Space

20. Facility owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

DALE RODRIGUEZ

Signature

[Signature]

MONTH DAY YEAR

01 14 00

In case of an emergency or spill immediately call the National Response Center (800) 424-8802 and the PA DER (717) 787-4343

Inspections									
Inspection ID: 002147		Insp Type: CEI		Compliance Evaluation:		Date Inspected: 02/24/2000			
Inspected Entry									
Cat: PF	Entry: 1-17	PA0001100017		CMS GLSRETH PACKAGING		Program Specific ID: PA0001100017			
Type: CAMMO		Captive Haz: Kind:		Status: ACTV		Active:			
More SF: Sub: 0001		PA0001100017		CMS GLSRETH PA		Type: LOGEN		SF:	
Fac:						Status:			
<div> <div>General</div> <div>Insp SF</div> <div>Viol</div> <div>Comp Act</div> <div>Cover Area</div> <div>Admin</div> </div>									
Owner/Operator: 00043		23-1004007		CMS GLSRETH PNG SYS					
Inspector: 000001		PAGE, ALEX				More			
Due Date:		Inspection Result: 100%		Violation(s) Noted:					
Date Scheduled:		Scheduled By:							
Agency: DEP		PA Dept of Environmental Protection				External Joint Insp: <input type="checkbox"/>		Viol Insp: <input type="checkbox"/>	
Program: MAMPV				ICS Code: 4100		SE REGIONAL OFFICE, CONSHOHOCKEN			
<div> <div>PF Related Info:</div> <div>County: 03</div> <div>Bucks</div> <div>Municipality: 00001</div> <div>Chew</div> </div>									
<div> <div>Go Back</div> <div>Go To</div> </div>									

Total value to inspection record

Record: 1/1

List of values